

**STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION**

Ameren Transmission Company of Illinois	}	
	}	
Petition for a Certificate of Public Convenience	}	
and Necessity, pursuant to Section 8-406.1 of	}	
the Illinois Public Utilities Act, and an Order	}	
pursuant to Section 8-503 of the Public Utilities	}	Case No.: 12-0598
Act, to Construct, Operate and Maintain a New	}	
High Voltage Electric Service Line and Related	}	
Facilities in the Counties of Adams, Brown, Cass,	}	
Champaign, Christian, Clark, Coles, Edgar,	}	
Fulton, Macon, Montgomery, Morgan, Moultrie,	}	
Pike, Sangamon, Schuyler, Scott, and Shelby,	}	
Illinois.	}	

**DIRECT TESTIMONY ON REHEARING

OF

WAYNE EDWARDS**

Intervenor MSSCLPG Exhibit 5.0

1 **DIRECT TESTIMONY ON REHEARING OF WAYNE EDWARDS**

2 **Q. PLEASE STATE YOUR NAME AND CURRENT RESIDENTIAL ADDRESS.**

3 A. Wayne Edwards. 72 Stonycreek, Chatham, Illinois.

4 **Q. ARE YOU FAMILIAR WITH THE PROCEEDING IN WHICH YOU ARE**
5 **SUBMITTING THIS TESTIMONY?**

6 A. Yes, I am.

7 **Q. CAN YOU BRIEFLY DESCRIBE YOUR FAMILIARITY WITH THE**
8 **PROCEEDING IN WHICH YOU ARE SUBMITTING THIS TESTIMONY?**

9 A. Yes, I can. Illinois Commerce Commission Docket No.: 12-0598 is a proceeding initiated
10 by Ameren Transmission Company of Illinois (“ATXI”), seeking a Certificate of Public
11 Convenience and Necessity and an Order from the Commission to construct, operate, and
12 maintain a new high voltage electric service line and related facilities in the Illinois counties
13 of Adams, Brown, Cass, Champaign, Christian, Clark, Coles, Edgar, Fulton, Macon,
14 Montgomery, Morgan, Moultrie, Pike, Sangamon, Schuyler, Scott, and Shelby. The original
15 Petition in this matter was filed on November 7, 2012. Because of some amendments to the
16 original Petition, the Administrative Law Judges in this matter ruled that the Petition should
17 be treated as if it were filed in total on January 7, 2013. I am a part of a group of intervenors
18 to this petition, collectively known as the Morgan, Sangamon, and Scott Counties Land
19 Preservation Group. Our group is represented by counsel and we are participating as an
20 active party to this proceeding. I am filing this testimony as a representative of the group and
21 in accordance with the current Case Management Order.

22 **Q. ARE YOU AUTHORIZED TO TESTIFY ON BEHALF OF, AND AS A**

23 **REPRESENTATIVE OF, THE MORGAN, SANGAMON, AND SCOTT COUNTIES**
24 **LAND PRESERVATION GROUP?**

25 A. Yes, I am. I am authorized to testify on behalf of the Morgan, Sangamon, and Scott Counties
26 Land Preservation Group and, more particularly, I submit my testimony after careful
27 collaboration with the following group members: Tom Lucas of 248 DeLong Road, Waverly,
28 Illinois. Steve and Betty Workman of Apache Junction, Arizona. Don Workman of Cave
29 Creek, Arizona.

30 **Q. BRIEFLY DESCRIBE THE COMPOSITION OF THE MORGAN, SANGAMON,**
31 **AND SCOTT COUNTIES LAND PRESERVATION GROUP.**

32 A. The Morgan, Sangamon, and Scott Counties Land Preservation Group is a collective of
33 intervening interests to this proceeding. Each intervening interest represents more than
34 simply an individual or single parcel of land. We are a collective of what we believe would
35 otherwise represent separate and unique Petitions to Intervene in this proceeding. Our group
36 is made up of individuals, residents, landowners, farmers, and otherwise interested parties,
37 all with an interest in land along and/or upon the general path of the Project which is the
38 subject of this proceeding.

39 **Q. CAN YOU STATE AS SUCCINCTLY AS POSSIBLE WHAT OUTCOME THE**
40 **MORGAN, SANGAMON, AND SCOTT COUNTIES LAND PRESERVATION**
41 **GROUP ADVOCATES IN THIS PROCEEDING?**

42 A. Yes, I can. Quite simply, the Morgan, Sangamon, and Scott Counties Land Preservation
43 Group advocates approval of the Petition as filed with approval given to a routing option
44 which follows the existing 138 kV line for the segment of the route between Meredosia and

Pawnee, Illinois (“MSCLTF Route”). Such routing option was initially presented herein as an alternate route by the Morgan and Sangamon County Landowners and Tenant Farmers (“MSCLTF”) on December 31, 2012 and by supplemental identification of January 3, 2013.

Q. HAVE YOU HAD A CHANCE TO FAMILIARIZE YOURSELF WITH THE DOCUMENTS AND TRANSCRIPTS OF PROCEEDINGS THAT HAVE BEEN FILED IN THIS MATTER TO DATE?

A. Yes, I have. While I am presenting this as my initial testimony in this matter, I have familiarized myself, with the assistance of counsel, with what has transpired to date. I feel I have a comfortable understanding of the status of the case as it now exists. I would also like to incorporate by reference the testimony that has been filed in this case to date by the Morgan, Sangamon, and Scott Counties Land Preservation Group, with the one clarification being that our group now unanimously supports the routing option for the segment of the project between Meredosia and Pawnee, Illinois, known as the MSCLTF Route, as was described above. I would also like to incorporate by reference the testimony that is being filed contemporaneously with this, my Direct Testimony on Rehearing, by other members of the Morgan, Sangamon, and Scott Counties Land Preservation Group.

Q. DOES THE MORGAN, SANGAMON, AND SCOTT COUNTIES LAND PRESERVATION GROUP OPPOSE THE ROUTING OPTION FOR THE SEGMENT OF THE PROJECT BETWEEN MEREDOSIA AND PAWNEE, ILLINOIS, WHICH WAS INITIALLY INTRODUCED IN THIS PROCEEDING AS ATXI’S PROPOSED ALTERNATE ROUTE AND SINCE WHICH HAS COME TO BE KNOWN AS ATXI’S REBUTTAL RECOMMENDED ROUTE?

67 A. Yes, it does. The Morgan, Sangamon, and Scott Counties Land Preservation Group
68 specifically opposes the ATXI Rebuttal Recommended Route for the segment from
69 Meredosia to Pawnee, Illinois. The basis for our opposition is a desire to maintain the
70 integrity of the primarily farmland which comprises the land which is our interest. The ATXI
71 Rebuttal Recommended Route would compromise not only the integrity and viability of the
72 land itself, but also jeopardize existing and heavily relied upon farming methods, as well as
73 present environmental and safety concerns to the area. The ATXI Rebuttal Recommended
74 Route is also affected by easements from the Panhandle Eastern Pipeline Company, LP. The
75 Panhandle Eastern Pipeline Company, LP has both a natural gas pipeline and a 12,000 acre
76 natural gas storage area that would be directly affected by the ATXI Rebuttal Recommended
77 Route.

78 **Q. ARE YOU FAMILIAR WITH A PROPOSED ROUTING OPTION WHICH WAS**
79 **PRESENTED IN THIS MATTER BY ANDREW AND STACY ROBINETTE ON**
80 **FEBRUARY 13, 2013, AND IF SO, CAN YOU SPEAK TO THE MORGAN,**
81 **SANGAMON, AND SCOTT COUNTIES POSITION WITH REGARD TO SUCH**
82 **ROUTING OPTION?**

83 A. Yes, I am and I can. The Morgan, Sangamon, and Scott Counties Land Preservation Group
84 is opposed to the modified routing proposal presented by the Robinettes. Such modification
85 would grant approval to the ATXI Rebuttal Recommended Route with the Robinettes'
86 modification. The Morgan, Sangamon, and Scott Counties Land Preservation Group is
87 opposed to such routing option for the following reasons: (1) The reasons detailed herein and
88 incorporated by reference for opposition to the ATXI Rebuttal Recommended Route in total.

(2) The Robinettes' modification would create the presence of lines which would preclude the use of some of the latest farming technologies, such as aerial seeding. (3) The presence of the towers and line would limit the ability to have livestock, and prohibit such ability altogether, on significant portions of the land which is the interest of the Morgan, Sangamon, and Scott Counties Land Preservation Group. (4) In addition to decreasing the value of the property, annual production would be adversely affected. (5) I note that the Apple Creek runs through the land which is proposed for routing by the Robinettes' modification. This is bottom land with a high water table. (6) The potential now exists for the development of a large source of water which runs roughly through and parallel to Apple Creek in the southern portion of two of the farms which are the interest of the Morgan, Sangamon, and Scott Counties Land Preservation Group. The presence of towers and lines through this area, could hamper or eliminate consideration for future development.

Q. DO YOU HAVE IN YOUR POSSESSION AND ARE YOU FILING CONTEMPORANEOUSLY WITH THIS TESTIMONY ANY DOCUMENTS, MAPS, PHOTOGRAPHS, OR OTHERWISE RELEVANT ITEMS WITH WHICH YOU ARE FAMILIAR AND ABOUT WHICH YOU CAN ELABORATE IF ASKED AS THEY MIGHT RELATE TO THIS YOUR DIRECT TESTIMONY ON REHEARING?

A. Yes, I am and I can. I have produced a schematic and photographs which are in my possession and which assist in my presentation of this testimony. Photocopy representations of such items are being filed contemporaneously with this testimony and are identified as Intervenor MSSCLPG Exhibit 5.1.

111 **Q. WITH REFERENCE TO WHAT HAS BEEN MARKED AS INTERVENOR**
112 **MSSCLPG EXHIBIT 5.1, IS THIS A GROUP EXHIBIT THAT YOU HAVE**
113 **PREPARED THAT DEPICTS A PORTION OF THE REBUTTAL RECOMMENDED**
114 **ROUTE AND ITS PROXIMITY TO YOUR FARM?**

115 A. Yes it is.

116 **Q. WITH REFERENCE TO WHAT HAS BEEN MARKED AS INTERVENOR**
117 **MSSCLPG EXHIBIT 5.1, CAPTIONS HAVE BEEN INCLUDED ON CERTAIN**
118 **PAGES. DO THESE CAPTIONS DESCRIBE WHAT THE VARIOUS PAGES**
119 **PURPORT TO SHOW?**

120 A. Yes they do.

121 **Q. WITH REFERENCE TO WHAT HAS BEEN MARKED AS INTERVENOR**
122 **MSSCLPG EXHIBIT 5.1, DOES THIS TRULY AND CORRECTLY REFLECT THE**
123 **AREA THAT WILL BE SUBJECT TO THE REBUTTAL RECOMMENDED**
124 **ROUTE?**

125 A. Yes it does.

126 **Q. IS THERE ANYTHING FURTHER THAT YOU WOULD LIKE TO ADD?**

127 A. I would state that, by reviewing the record in this case to date, it seems that utilizing the
128 existing 138 kV corridor would be the least cost option. Since this is a shorter routing
129 option, there would be less disruption to the farmers and residents. Also, this option is far
130 less costly to construct.

131 **Q. DOES THIS CONCLUDE YOUR TESTIMONY?**

132 A. Yes, it does.